

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :  
CHRISTOPHER J. CAVALIER, :  
MARAGARET A. CAVALIER. :  
Debtor, : Case No.: 1:18-bk-03303-HWV  
: Chapter 13  
: 11 U.C.S. 362  
DITECH FINANCIAL LLC, :  
Movant, :  
: v. :  
CHRISTOPHER J. CAVALIER. :  
MARAGARET A. CAVALIER, :  
Respondents, :  
CHARLES J. DEHART, III :  
Trustee :  
:

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

**AND NOW COME**, Debtors, Christopher J. Cavalier and Maragaret A. Cavalier, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. It is admitted Debtors are behind to movant.

It is denied as to the amount of post-petition arrears. Debtors are hopeful that after a correct calculation that Movant will stipulate to or allow a cure via an amended plan.

7. Admitted in part and denied in part. It is admitted Debtors are behind to movant. It is denied as to the amount of post-petition arrears. Debtors are hopeful that after a correct calculation that Movant will stipulate to or allow a cure via an amended plan.

8. Denied.

9. Denied.

10. Denied.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: July 9, 2019

s/Chad J. Julius

Chad J. Julius  
ID# 209496  
8150 Derry Street  
Harrisburg, PA 17111.5260  
717.909.5858

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**CERTIFICATE OF SERVICE**

I, Colleen, paralegal with Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion For Relief From The Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

**ECF/CM:**

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	James C. Warmbrodt, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 17106-1532
U.S. Trustee 228 Walnut Street, Suite A Harrisburg, PA 17101	

s/Colleen Reed  
Colleen Reed, Paralegal  
Jacobson, Julius & Harshberger  
8150 Derry Street  
Harrisburg, PA 17111  
717.909.5858  
Email: creed@ljacobsonlaw.com

Dated: July 9, 2019